

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

ERIC J. MCCANTS #726088

(Enter above the full name of the plaintiff(s), including prisoner number, in this action. If you cannot list all plaintiffs in the space provided, please write "see attached" and list all names on an additional page.)

v.

HEIDI WASHINGTON (MDOC DIRECTOR) ET AL.,

(Enter above the full name of the defendant(s) in this action. If you cannot list all defendants in the space provided, please write "see attached" and list all names on an additional page.)

COMPLAINT
(Print Clearly)

I. Previous Lawsuits

CAUTION: The Prison Litigation Reform Act has resulted in substantial changes in the ability of incarcerated individuals to initiate lawsuits in federal courts without prepayment of the civil action filing fee. Accurate and complete responses are required concerning your litigation history. Generally, a plaintiff's failure to accurately and completely answer the questions set forth below will result in denial of the privilege of proceeding *in forma pauperis* and require you to pay the entire \$402.00 filing fee regardless of whether your complaint is dismissed.

- A. Have you ever filed a lawsuit while incarcerated or detained in any prison or jail facility? Yes ☐ No ☒
- B. If your answer to question A was yes, for each lawsuit you have filed you must answer questions 1 through 5 below. Attach additional sheets as necessary to answer questions 1 through 5 below with regard to each lawsuit.
1. Identify the court in which the lawsuit was filed. If it was a state court, identify the county in which the suit was filed. If the lawsuit was filed in federal court, identify the district within which the lawsuit was filed.

 2. Is the action still pending? Yes ☐ No ☒
 - a. If your answer was no, state precisely how the action was resolved: _____

 3. Did you appeal the decision? Yes ☐ No ☐
 4. Is the appeal still pending? Yes ☐ No ☐
 - a. If not pending, what was the decision on appeal? _____

 5. Was the previous lawsuit based upon the same or similar facts asserted in this lawsuit? Yes ☐ No ☒
 - a. If so, explain: _____

FILED - GR

March 14, 2022 1:30 PM

CLERK OF COURT

U.S. DISTRICT COURT

WESTERN DISTRICT OF MICHIGAN

BY:JMW SCANNED BY: KB 3/14

2:22-cv-53

Maarten Vermaat

U.S. Magistrate Judge

II. Parties**A. Plaintiff(s)**

Enter your name, place of confinement, address, and place of confinement during the events described in the complaint in the blanks below. Provide the same information for any additional plaintiffs. Attach extra sheets as necessary.

Name of Plaintiff SEE ATTACHMENTS

Place of Present Confinement _____

Address _____

Place of Confinement During Events Described in Complaint _____

B. Defendant(s)

Complete the information requested below for each defendant in this action, including whether you are suing each defendant in an official and/or personal capacity. Provide the same information for each additional defendant. If there are more than six defendants attach extra sheets as necessary.

Name of Defendant #1 _____

Position or Title _____

Place of Employment _____

Address _____

Official and/or personal capacity? _____

Name of Defendant #2 _____

Position or Title _____

Place of Employment SEE ATTACHMENTS

Address _____

Official and/or personal capacity? _____

Name of Defendant #3 _____

Position or Title _____

Place of Employment _____

Address _____

Official and/or personal capacity? _____

Name of Defendant #4 _____

Position or Title _____

Place of Employment _____

Address _____

Official and/or personal capacity? _____

Name of Defendant #5 _____

Position or Title _____

Place of Employment _____

Address _____

Official and/or personal capacity? _____

III. **Statement of Claim**

State here the **facts** of your case. Describe how each defendant is personally involved. Include also the names of other persons involved, dates and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. **Do not include unrelated claims.** Use as much space as you need. Attach extra sheets if necessary.

SEE ATTACHMENTS

IV. Relief

State briefly and precisely what you want the court to do for you.

SEE ATTACHMENTS

V. Notice to Plaintiff Regarding Consent

In accordance with the provisions of 28 U.S.C. § 636(c) and Federal Rule of Civil Procedure 73, you are hereby notified that the United States magistrate judges of this district court may, upon your consent, conduct any or all proceedings in this case, including a jury trial and entry of a final judgment. If you consent, any appeal from a judgment entered by a magistrate judge shall be taken directly to the United States Court of Appeals for this judicial circuit in the same manner as an appeal from any other judgment of a district court.

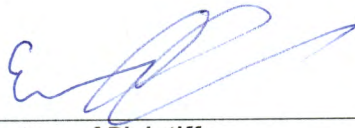
Magistrate judges have greater flexibility in their schedules than district judges, who have heavy criminal caseloads that take priority over civil trials. Accordingly, the magistrate judges are generally able to schedule prisoner civil rights cases for jury trial much sooner, and they are able to provide firm trial dates. Magistrate judges are experienced trial judges who handle a great number of prisoner civil rights cases.

Your decision to consent to the dispositive jurisdiction of a United States magistrate is entirely voluntary. If you do not consent to a magistrate judge, the case will be randomly assigned to a district judge. The magistrate judge already assigned to this case would continue to decide all pretrial matters and would handle all dispositive motions by report and recommendation.

Please check **ONE** box below to indicate whether you voluntarily consent to proceed with a United States magistrate judge or if you would instead prefer that the case be assigned to a district judge.

- ☐ I hereby voluntarily consent to the United States magistrate judge conducting all proceedings in this case, including entry of a final judgment and all post-judgment matters.
- ☐ I request that this case be assigned to a district judge.

3-9-22
Date


Signature of Plaintiff

NOTICE TO PLAINTIFF(S)

The failure of a *pro se* litigant to keep the court apprised of an address change may be considered cause for dismissal.

DISTRICT COURT FOR THE UNITED STATES OF AMERICA
IN THE WESTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

ERIC J. MCCANTS #726088
PLAINTIFF (IN PRO-PER),

CASE NO. _____

V.

HONORABLE JUDGE:

HEIDI WASHINGTON (MDOC DIRECTOR);
ERICA HUSS (WARDEN);
BRENDA JAMES (H.U.M.)/NURSE;
UNKNOWN CHRISTY/KRISTY (NURSE);
UNKNOWN ALLEN (SGT./GUARD);
UNKNOWN LEECH (LT./GUARD);
UNKNOWN MORGAN (GUARD);

"JURY TRIAL DEMANDED"

DEFENDANT'S.

AMERICAN'S DISABILITY ACT AND 42 U.S.C. §1983

NOW COMES, PLAINTIFF ERIC J. MCCANTS, FILE THIS ACTION PURSUANT TO AMERICANS DISABILITY ACT 42 U.S.C. §§12101-12213 AND 42 U.S.C §1983 ASSERTING VIOLATIONS OF DISCRIMINATION DUE TO HIS MENTAL DISABILITIES, AND DELIBERATE INDIFFERENCE TO HIS SERIOUS MEDICAL NEED AND BREACH OF DUTY TO A SUBSTANTIAL RISK. NOW SUES FOR COMPENSATORY AND PUNITIVE DAMAGES.

1. VENUE IS PROPER IN THE WESTERN DISTRICT NORTHERN DIVISION PURSUANT TO 28 USC §1391, AT LEAST ONE DEFENDANT RESIDES THERE, AND A SUBSTANTIAL PART OF PLAINTIFF'S BILL OF PARTICULARS AROSE THERE.

PARTIES

2. PLAINTIFF, ERIC J. MCCANTS, A PRISONER HELD UNDER THE CUSTODY OF THE MICHIGAN DEPARTMENT OF CORRECTIONS CAN BE LOCATED AT THE MARQUETTE BRANCH PRISON, 1960 U.S. HWY 41 SOUTH, MARQUETTE, MI 49855.

3. DEFENDANT HIEDI WASHINGTON (DIRECTOR OF MDOC) CAN BE LOCATED AT GRAND PLAZA BUILDING, P.O. BOX 30003, LANSING, MI 49908

DEFENDANT'S ERICA HUSS (WARDEN); BRENDA JAMES (H.U.M.); UNKNOWN KRISTY/CHRISTY (NURSE); UNKNOWN ALLEN (SGT./GUARD); UNKNOWN LEECH/LEACH (LT./GUARD); UNKNOWN MORGAN (GUARD) CAN BE LOCATED AT THE MARQUETTE BRANCH PRISON, 1960 U.S. HWY 41 SOUTH, MARQUETTE, MI 49855.

4. ALL DEFENDANT'S ACTED CONTRARY TO FEDERAL LAW.

5. ALL DEFENDANT'S ACTED UNDER COLOR OF STATE LAW.

6. ALL DEFENDANT'S ARE BEING SUED IN THEIR OFFICIAL AND INDIVIDUAL CAPACITY.

STATEMENT OF FACTS

VIOLATIONS OF AMERICAN'S DISABILITY ACT

7. THIS INCIDENT ARISE WHEN PLAINTIFF MCCANTS WHO WAS A HOUSING PORTER REFUSED TO WORK BECAUSE "THE LACK OF PROTECTIVE EQUIPMENT/GEAR" AND THEN THREATENED BY DEFENDANT'S TO BE PUT IN "AD SEG" IF HE REFUSED TO WORK. PLAINTIFF MCCANTS THEN COLLAPSED INTO DECOMPENSATE MENTAL STATE AND FELL INTO A MENTAL EPISODE. PLAINTIFF MCCANTS WAS/IS DIAGNOSED WITH SCHIZOAFFECTIVE DISORDER, DEPRESSION DISORDER, ANXIETY DISORDER, BI-POLAR DISORDER, HEARING VOICES, SEEING THINGS THAT ARE NOT THERE AND PTSD. PLAINTIFF MCCANTS IS CLASSIFIED AND DIAGNOSED BY THE MENTAL

HEALTH DEPARTMENT AS A PRISONER WITH "MAJOR MENTAL DISORDER" (MMD). IT IS WELL DOCUMENTED AND RECORDED THAT MCCANTS SUFFERS A MENTAL DISORDER SINCE THE AGE OF 7, AND THAT DEFENDANT'S KNEW AT CERTAIN INTERVALS MCCANTS REPEATEDLY SLIPPED INTO AN EPISODE.

8. ON/ABOUT MID-SEPTEMBER 2020, DEFENDANT WASHINGTON AND HUSS TRANSPORTED A NUMBER OF PRISONER'S INTO MARQUETTE BRANCH PRISON DIAGNOSED WITH COVID-19 TO BE BACKED BY MEMORANDUM 2020-30R6 WHICH IS PURPORTED FOR "INFECTION PREVENTION PROTOCOLS". WASHINGTON AND HUSS DID NOT SEPARATE THE TESTED POSITIVE PRISONER'S FROM THE TESTED NEGATIVE PRISONER'S WHICH MCCANTS WAS "A NEGATIVE". THE FAILURE TO ADHERE TO SAFETY PROTOCOL DIRECTLY PUT MCCANTS INTO A PARANOID STATE OF MIND.

9. THE MEMORANDUM 2020-30R6, SPECIFICALLY COMMANDS STAFF AND PRISONER'S TO "WEAR MASK AND GLOVES", "USE HAND-SANITIZER", "SOCIAL DISTANCING" AND "CLEANLINESS". SOCIAL DISTANCING NEVER HAPPENED NO MORE THAN ONE FOOT AWAY. WHEN THE SAFETY PROTOCOL MANDATED "SIX FEET".

10. WASHINGTON AND HUSS HOUSED PRISONER'S WITH COVID-19 WITH PRISONER'S WHO DID NOT HAVE COVID-19 OR SYMPTOMATIC SIGNS OF COVID-19. HOWEVER, COVID-19 PRISONER'S USED THE SAME TELEPHONE, SAME J-PAY MACHINE, STORE-MACHINE, AND SHOWERS. PRISON STAFF WORE MASK AND PROTECTIVE GEAR TO PROTECT THEMSELVES BUT MCCANTS AND OTHER PRISONER'S WERE TREATED AS "LAB RATS."

11. PLAINTIFF MCCANTS COULD SEE PRISON STAFF DELIBERATELY WAS COMMITTING A SUBSTANTIAL RISK AND DELIBERATE INDIFFERENCE. THIS SENT PLAINTIFF MCCANTS INTO A DEPRESSION AND BUILT UP ANXIETY DUE TO THE FEAR OF CATCHING COVID-19.

12. ON/ABOUT OCTOBER 3, 2020 DEFENDANT MORGAN CAME TO PLAINTIFF'S CELL

AND ORDER PLAINTIFF TO WORK. PLAINTIFF REFUSED STATING "THAT Y'ALL ARE NOT GIVING ME THAT SHIT, Y'ALL WEARING PROTECTIVE GEAR, AND JUST WANT ME WEARING NOTHING THIS STUFF Y'ALL DOING GOT ME DEPRESSED AND MY ANXIETY IS OUT OF CONTROL TO BE ABLE TO DO ANYTHING! (SIC)." MORGAN THEN SAID "I AM GIVING YOU A DIRECT ORDER." PLAINTIFF MCCANTS STILL REFUSED TO COME OUT AND MAKE ANY CONTACT WITH PRISONER'S WITH COVID. DEFENDANT MORGAN DISCRIMINATED AGAINST MCCANTS BECAUSE MORGAN DID NOT ORDER NON-MMD PRISONER'S TO WORK WHEN MCCANTS EMPHASIZED HIS MENTAL HEALTH WAS IN JEOPARDY. MORGAN KNEW MCCANTS SUFFERED A MENTAL ILLNESS BECAUSE HE ESCORT THE PRISON NURSES EVERYDAY TO MCCANT'S CELL TO DISPENSE PSYCHIATRIC MEDICATIONS.

13. ON/ABOUT OCTOBER 4, 2020 DEFENDANT SGT. ALLEN COME THE VERY NEXT DAY, BEING BELLIGERENT AND APPREHENSIVE YELLED AT PLAINTIFF MCCANTS "I DON'T CARE ABOUT WHAT YOU SAY IS A SAFETY RISK AND ALL THIS MENTAL STUFF, IF YOU DON'T COME OUT AND PASS CLEANING SUPPLIES I GONNA HAVE TO PUT YOU IN D-BLOCK ("AD SEG"), MAYBE A KNIFE IS FOUND IN YOUR CELL, MAYBE YOU THREATENED ONE OF MY OFFICERS."

14. PLAINTIFF'S MCCANTS EARLIER RELEASE DATE(ERD) IS WITHIN 2 YEARS. A POSSESSION OF A KNIFE/SHANK IS A NEW CHARGE PLUS THE 4TH HABITUAL WHICH DEFENDANT'S ALLEN THREAT WAS TO GIVE PLAINTIFF MCCANTS ANOTHER 20 YEARS OR LIFE SENTENCE FOR REFUSING TO PASS OUT CLEANING SUPPLIES TO COVID-19 PRISONER'S WITHOUT BEING PROVIDED THE NECESSARY PROTECTIVE GEAR WORN BY THE OFFICERS.

15. ON/ABOUT OCTOBER 5, 2022 SGT./LT. LEACH/LEECH CAME TO PLAINTIFF'S MCCANTS CELL WHILE MCCANTS WAS LAYING DOWN WATCHING T.V., LEACH/LEECH SAID "WE CONTACTED YOUR PSYCHOLOGIST CASE MANAGER AND HE SAID YOU WAS GOOD TO WORK". MCCANTS SAID "I AM WATCHING T.V. RIGHT NOW TO TRY AND SUBSIDE HEARING VOICES, MAN... Y'ALL KNOW ALL THESE PRISONER'S ARE SICK, WHY Y'ALL KEEP TRYING TO GET ME SICK TOO?" LEECH/LEACH RESPONDED "YOU DAMN RETARD, FUCK ALL THAT! YOU WORK WHEN WE TELL YOU!" MCCANTS

RESPONDED "Y'ALL HAVE 4 OTHER PORTERS WHY ARE Y'ALL FOCUS ON ME?" LEECH/LEACH THEN SAID "AD SEG OR WORK."

16. PLAINTIFF MCCANTS THEN CAME OUT TO WORK DUE TO THREATS OF "AD SEG" AND "POTENTIALLY NEW CHARGES".

17. ON/ABOUT OCTOBER 14, 2020 PLAINTIFF MCCANTS BEGIN TO FEEL "CHILLS", "SUFFER HEADACHES", "COLDSWEATS" AND "LOST OF APPETITE". MCCANTS IMMEDIATELY REPORTED THESE COVID-19 SYMPTOMS TO PRISON STAFF. PLAINTIFF WAS TOLD "NURSE ROUNDS WILL BE MADE." HOWEVER, THE NURSE MOVED "TIP-TOEISH", "SNEAKY" AND "UN-ANNOUNCED" TRYING TO AVOID DEALING WITH SO MANY PRISONER'S WHO ATTRACTED THE VIRUS OR SHOWED SYMPTOMS, PRISON GUARDS WOULD THEN SAY "SHE (RN CHRISTY/KRISTY) SAID TO SEND A KITE.".

18. ON/ABOUT OCTOBER 8, 2020 PLAINTIFF MCCANTS BECAME SO DIZZY FROM HEADACHES AS HE LAID IN BED PLAINTIFF BEGIN TO SPIT-UP BLOOD. MCCANTS BELIEVED HE WAS DYING AND DESPITE COMPLAINING TO STAFF HE WAS TOTALLY IGNORED.

19. ON/ABOUT OCTOBER 17, 2020 PLAINTIFF MCCANTS WAS EVALUATED AND FOUND TO BE "POSITIVE" FOR COVID-19.

20. ON/ABOUT OCTOBER 19, 2020 DEFENDANT BRENDA JAMES WHILE MAKING ROUNDS STOPPED AT PLAINTIFF'S CELL TO TAKE BLOOD PRESSURE. PLAINTIFF'S BLOOD PRESSURE AND FEVER WAS EXTREMELY HIGH. AND PLAINTIFF COMPLAINED ABOUT PAIN AND ASKED FOR PAIN MEDICATION SUCH AS "TYLENOLS" OR "MOTRINS" OR VITAMINS TO SUBSIDE HEADACHES AND BODY ACHES. BRENDA JAMES SAID "NOT HER PROBLEM AND WALKED OFF."

21. ON/ABOUT OCTOBER 20, 2020 WHILE DEFENDANT KRISTY/CHRISTY MADE ROUNDS STOPPED AT PLAINTIFF'S CELL. PLAINTIFF COMPLAINED OF "SEVERE HEADACHES", "BREATHING SHORTNESS", "SPITTING UP BLOOD 3 TIMES THAT DAY", "CHILLS", AND "COLD SWEATS". PLAINTIFF TOLD CHRISTY/KRISTY THAT "HE FELT LIKE HE WAS DYING!" PLAINTIFF ASKED TO BE TAKEN TO THE HOSPITAL? CHRISTY/KRISTY RESPONDED "THEN WE'LL HAVE TO TAKE EVERYBODY TO THE HOSPITAL. AT NO TIME DID CHRISTY/KRISTY PROVIDE ANY MEDICATION TO SUBSIDE PLAINTIFF'S SYMPTOMS.

22. PLAINTIFF MCCANTS STRUGGLED TO SURVIVE FOR LIFE FOR MORE THAN 3 WEEKS. MCCANTS WAS LEFT IN A CELL UNATTENDED AND IGNORED DEFENDANT'S AND UNKNOWN DEFENDANT'S TREATED PLAINTIFF AS IF PLAINTIFF WAS TOO MENTALLY DISABLE TO WRITE GRIEVANCE AND FOLLOW UP ON THE WAY MCCANTS HAD BEEN TREATED.

23. WASHINGTON AND HUSS KNEW OF THE RISK, AND GENERATED A MEMORANDUM BUT DID NOT FOLLOW UP ON OVERSIGHTS OR OPERATIONS OF THE MEMORANDUM IN PRACTICE. WHEN HUSS (WARDEN) MADE ROUNDS IN B-BLOCK SHE WORE "SAFETY GEAR", SHE WORE HEAD SAFETY GEAR AND A PLASTIC SHIELD OVER HER FACE AND HEAD, A SAFETY GOWN, GLOVES, AND COVERS OVER HER SHOES. WARDEN HUSS KNEW OF THE RISK BUT FAILED TO PROTECT MCCANTS OF THE RISK. WASHINGTON AND HUSS FAILED TO APPROPRIATELY DISCHARGE THEIR SUPERVISORY DUTIES BY ENCOURAGING AND AUTHORIZED THE NEGATIVE PRISONER'S NOT TO BE SEPARATED FROM THE TESTED POSITIVE PRISONER'S, AND THE MEMORANDUM CLEARLY SHOW DEFENDANT'S WASHINGTON AND HUSS HAD A DUTY TO ACT, BUT PUT ON NOTHING BUT A FACADE AT BEST.

24. UNDOUBTLY, MANY OF MCCANTS MENTAL DISABILITIES ARE APPARENT AND DEFENDANT'S KNEW AND SHOULD HAVE KNOWN THAT DISCRIMINATION AND DELIBERATE INDIFFERENCE TOWARD MCCANTS VIOLATED FEDERAL LAW AND CONSTITUTIONAL RIGHTS.

LEGAL CLAIMS

CLAIM I.

25. PLAINTIFF MCCANTS RE-ALLEGES ¶7-23, AND AVERS THAT, DEFENDANT'S WASHINGTON AND HUSS ACT MALICIOUSLY AND SADISTICALLY TO DID VIOLATE SUPERIOR LIABILITY AND DELIBERATE INDIFFERENCE WHEN: 1) FAILED TO APPROPRIATELY DISCHARGE HER SUPERVISORY DUTIES; 2) ENCOURAGED DELIBERATE INDIFFERENCE TO ATTRACT COVID-19; 3) FAILED DUTY TO ACT OR AUTHORIZED PROTECTIVE EQUIPMENT FOR PRISONER PORTERS, CONTRARY TO, ADA 42 U.S.C. §§12101-12213, 42 U.S.C. §1983, AND EIGHTH AMENDMENTS OF U.S. CONST.

CLAIM II.

26. PLAINTIFF MCCANTS RE-ALLEGES ¶8-24, AND AVERS THAT, DEFENDANT'S MORGAN, ALLEN, AND LEECH/LEACH DID SADISTICALLY AND MALICIOUSLY VIOLATED AMERICAN'S W/ DISABILITIES ACT AND DELIBERATE INDIFFERENCE WHEN: 1.) DISCRIMINATED AGAINST PLAINTIFF FOR HAVING A MENTAL DISABILITY BY FORCING HIM TO WORK DESPITE BEING TOLD BY PLAINTIFF OF HAVING A DECOMPOSITION EPISODE. 2.) DELIBERATE INDIFFERENCE BY FORCING PLAINTIFF'S TO MINGLE WITH POSITIVE TESTED PRISONER'S WITH COVID-19, CONTRARY TO ADA, 42 U.S.C. §1983 AND EIGHTH AMENDMENT OF U.S. CONST.

CLAIM III.

27. PLAINTIFF MCCANTS RE-ALLEGES ¶16-24, AND AVERS THAT, DEFENDANT'S KRISTY/CHRISTY AND JAMES DID SADISTICALLY AND MALICIOUSLY DENY PROPER MEDICAL TREATMENT AND/OR NO TREATMENT AT ALL WHEN: 1) TIPPING TOEING AND SNEAKYING PASS PLAINTIFF'S CELL TO DENY PLAINTIFF MEDICAL NEED; AND 2.) DENYING ANY AND ALL PAIN MEDICATIONS, CONTRARY TO, 42 U.S.C. §1983 AND EIGHTH AMENDMENT OF US. CONST.

RELIEF PRAYED UPON

A. GRANT JURY TRIAL.

B. GRANT MEDIATION PROGRAM.

C. GRANT APPOINTMENT OF COUNSEL 28 U.S.C. §1915(E)(1), THIS CASE WAS AIDED AND ASSISTED IN PREPARATION BY PRISONER DIMITRUIS CLARK #868212, THESE ARE COMPLICATED ISSUES THAT MCCANTS WILL NEED PROFESSIONAL COUNSEL TO EFFECTIVELY PURSUE DUE TO INVESTIGATION AND DISCOVERY, AS WELL AS EFFECTIVELY CROSS EXAMINE WITNESSES OR DEFENDANT'S, OR WILL A EXPERT BE NEEDED. MCCANTS SUFFER MENTAL ILLNESS WHICH WOULD DETERMINE MCCANTS TO BE INCOMPETENT.

D. GRANT PRODUCTION OF DOCUMENTS, ADMISSIONS AND INTERROGATORIES.

E. GRANT INJUNCTIVE RELIEF TO BE PLACED IN PROPER PLACEMENT FOR MENTAL DISABLE.

F. GRANT COMPENSATORY DAMAGES IN THE AMOUNT OF \$200,000 (TWO MILLION DOLLARS) AGAINST DEFENDANT'S WASHINGTON, HUSS, MORGAN, ALLEN, LEACH/LEECH, KRISTY/CHRISTY, JAMES. \$4,000,000 IN PUNITIVE DAMAGES AGAINST WASHINGTON, HUSS, MORGAN, ALLEN, AND LEACH/LEACH.

G. ANY ADDITIONAL RELIEF THIS COURT DEEMS, JUST, PROPER, AND EQUITABLE.

DATED: 3-9-22 2022



ERIC J. MCCANTS #726088
(IN PRO-PER)
MARQUETTE BRANCH PRISON
1960 U.S. HWY 41 SOUTH
MARQUETTE, MI 49855

726088 ERIC MCCANTS

Marquette Branch prison

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